

Exhibit 1

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May 19, 2022

Via Email

Jessica D. Miller
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875-RBK (D.N.J.)

Dear Counsel:

We are writing with regard to certain items that remain to be addressed.

First, it is necessary to exchange liability expert reports on the merits and schedule the depositions and Daubert motions for those experts. We propose the following deadlines:

July 18, 2022 – Plaintiffs’ service of liability expert reports.

August 19, 2022 – Defendants’ service of liability expert reports.

September 12, 2022 – Plaintiffs’ service of rebuttal liability expert reports (if any).

September 30, 2022 – Completion of liability expert depositions

October 14, 2022 – Daubert motions filed regarding liability experts

November 7, 2022 – Responsive briefs on Daubert motions filed

November 21, 2022 – Reply briefs on Daubert motions filed

Jessica Miller, Esq.

March 19, 2022

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Note: We believe that the deadlines for the merits reports of experts whose opinions are limited solely to class issues (*i.e.*, Dr. Rena Conti, Laura Craft, and the corresponding defense experts) should be set on a schedule aligned with the disposition of *Daubert* and class certification motions.

Second, we propose the following schedule for the filing of dispositive motions.

October 24, 2022 – Dispositive motions filed

December 2, 2022 – Responsive briefs on dispositive motions filed

December 23, 2022 – Reply briefs on dispositive motions filed

Note: We believe that the Order should contemplate the need for class notice and the scope and timing of class notice and the notice period.

Third, we propose that Defendants file their respective Answers and Cross-Claims on or before June 30, 2022.

Fourth, we request the initiation of a meet and confer to discuss discovery with regard to the Losartan and Irbesartan claims. In addition to the need for this discovery to begin to move that part of the litigation forward, this information related to Losartan and Irbesartan is needed as we proceed with the Court ordered mediation process.

Please let us know when you can discuss the foregoing, as we believe it is necessary to present these issues to the Court at the upcoming June 1, 2022 case management conference.

Very Truly Yours,



Adam M. Slater

Cc: Defense Executive Committee (via email)
Plaintiffs' Executive Committee (via email)